

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.M.W.,

Plaintiff,

v.

KRISTI NOEM, *et al.*,<sup>1</sup>

Defendants.

Case No. 2:24-cv-01970-JHC

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND ORDER

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until August 13, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services (“USCIS”) to schedule an interview and adjudicate her asylum application. Defendants’ response to the Complaint is currently due on February 3, 2025. The

<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Department of Homeland Security Kristi Noem for Alejandro Mayorkas and U.S. Citizenship and Immigration Services (“USCIS”) Acting Director Jennifer B. Higgins for Ur M. Jaddou.

1 parties are currently working towards a resolution to this litigation. For good cause, the parties  
2 request that the Court hold the case in abeyance until August 13, 2025.

3 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706  
4 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to  
5 control the disposition of the causes on its docket with economy of time and effort for itself, for  
6 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.  
7 P. 1.

8 With additional time, this case may be resolved without the need of further judicial  
9 intervention. USCIS has scheduled Plaintiff’s asylum interview for April 15, 2025. USCIS agrees  
10 to diligently work towards completing the adjudication within 120 days of the interview, absent  
11 unforeseen or exceptional circumstances that would require additional time for adjudication. If  
12 the adjudication is not completed within that time, USCIS will provide a status report to the Court.  
13 Plaintiff will submit all supplemental documents and evidence, if any, to USCIS seven to ten days  
14 prior to the interview date. Plaintiff recognizes that failure to submit documents prior to the  
15 interview may require the interview to be rescheduled and the adjudication delayed. If needed,  
16 Plaintiff will bring an interpreter to the interview, otherwise the interview will need to be  
17 rescheduled and the adjudication delayed. Once the application is adjudicated, Plaintiff will  
18 dismiss the case with each party to bear their own litigation costs and attorneys’ fees. Accordingly,  
19 the parties request this abeyance to allow USCIS to conduct Plaintiff’s asylum interview and then  
20 process her asylum application.

21 As additional time is necessary for this to occur, the parties request that the Court hold the  
22 case in abeyance until August 13, 2025. The parties will submit a status update on or before  
23 August 13, 2025.

1 DATED this 28th day of January, 2025.

2 Respectfully submitted,

3 TESSA M. GORMAN  
United States Attorney

O'SULLIVAN LAW OFFICE

4 s/ Michelle R. Lambert

5 MICHELLE R. LAMBERT, NYS #4666657  
Assistant United States Attorney  
United States Attorney's Office  
Western District of Washington  
1201 Pacific Avenue, Suite 700  
Tacoma, Washington 98402  
Phone: (253) 428-3824  
Fax: (253) 428-3826  
Email: [michelle.lambert@usdoj.gov](mailto:michelle.lambert@usdoj.gov)

s/ Jane Marie O'Sullivan

JANE MARIE O'SULLIVAN WSBA#34486  
O'Sullivan Law Office  
2417 Pacific Avenue SE, 2nd Floor  
Olympia, Washington 98501  
Phone: 206-340-9980  
Email: [jane@osullivanlawoffice.com](mailto:jane@osullivanlawoffice.com)  
*Attorney for Plaintiff*

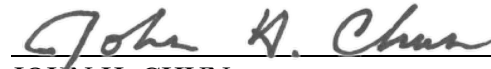
10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 395*  
12 *words, in compliance with the Local Civil Rules.*

**ORDER**

The case is held in abeyance until August 13, 2025. The parties shall submit a status update on or before August 13, 2025. It is so **ORDERED**.

DATED this 28th day of January 2025.

  
JOHN H. CHUN  
United States District Judge